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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

THE BUREAU FASHION WEEK LLC, a  
South Carolina Limited Liability Company;  
THE SOCIETY FASHION WEEK LLC, a  
South Carolina Limited Liability Company;

Plaintiffs, Cross-Defendants

vs.

NATALIYA NOVA LLC, a Nevada Limited  
Liability Company;

Defendant, Counter-Claimant

Case No.: 2:24-cv-00233-GMN-EJY

**JOINT DISCOVERY PLAN AND  
SCHEDULING ORDER**

PLAINTIFFS/COUNTER-DEFENDANTS THE BUREAU FASHION WEEK LLC, a  
South Carolina limited liability company, doing business as The Bureau, and THE SOCIETY  
FASHION WEEK LLC, a South Carolina limited liability company, doing business as The  
Society (collectively, “Plaintiffs”) and DEFENDANT/COUNTER-CLAIMANT NATALIYA  
NOVA LLC, a Nevada limited liability company (“Defendant”; collectively with Plaintiffs, the  
“Parties”), by and through their respective undersigned counsel, hereby stipulate and agree to the  
following Discovery Plan and Scheduling Order in this matter pursuant to FRCP 26(f) and Local  
Rule 26-1.

**I. Information Required by FRCP 26(a)**

**A. Rule 26(f) Conference.**

On June 06, 2024, counsel for the Parties held and concluded the Rule 26(f) conference as required by FRCP 26(f) and Local Rule 26-1. Louise Jillian Paris of Omni Legal Group, participated on behalf of Plaintiffs; and Roman Nikhman of Nikhman Law Firm PLLC, participated on behalf of Defendant.

**B. Rule 26(a) Disclosures.**

The Parties will exchange their “initial disclosures” required by FRCP 26(a) on or before June 20, 2024, within fourteen (14) days of their Rule 26(f) Conference.

**C. Scope and Timing of Discovery.**

The Parties agree discovery should extend to the full extent allowed by the Federal Rules of Civil Procedure and that discovery should not be limited to any particular issues.

- i. Discovery Cut-Off Date:** Defendant first appeared in this matter with the filing of its Answer and Counterclaim before this Court on April 16, 2024. Accordingly, the close of discovery shall occur on **October 7, 2024**.
- ii. Amending the Pleadings and Adding Parties:** All motions to amend the pleadings or add parties shall be filed no later than **July 10, 2024**, 90 days prior to the close of discovery.
- iii. Fed. R. Civ. P. 26(a)(2) Disclosures (Experts):** Disclosures concerning experts shall be made no later than **August 8, 2024**, 60 days before the discovery cut-off date. Disclosures concerning rebuttal experts shall occur no later than **September 9, 2024**, 30 days after the initial disclosure of experts.
- iv. Dispositive Motions:** The deadline for filing dispositive motions shall be **November 7, 2024**, 30 days after the discovery cut-off date.
- v. Pretrial Orders:** The deadline for the joint pretrial order is **December 9, 2024**, 30 days after the dispositive motion deadline.

**D. Electronically Stored Information.**

The Parties do not anticipate any unusual issues with respect to the disclosure or discovery of electronically stored information. The Parties agree that an ESI order is not necessary and agree to follow the procedures outlined below with regard to electronic discovery or ESI:

1. Besides Excel and PowerPoint files, all ESI will be produced in TIFF or PDF form created directly from the electronic file and each party agrees to maintain the native files without modification.
2. To the extent the produced ESI is kept in the ordinary course of business, the production shall be accompanied by its metadata, which shall include Custodian, Email Subject, From, Author, Recipient (s), including CC and CC receipts of an email, Date Created, Date Last Modified, and Date Sent and/or Received, File Extension, Attachment Range, Attachment Begin, and Attachment End (or the equivalent thereof), to the extent such metadata exist.
3. Either party may request production or inspection of any original document and the producing party shall make all reasonable efforts to accommodate that request. The parties reserve the right to object to producing ESI that is not reasonably accessible, or which would be unduly burdensome or costly to produce, or should not be produced for other reasons.
4. Excel and PowerPoint files will be produced in native format. If a party needs to redact a portion of an Excel spreadsheet, the parties will meet and confer regarding the production of the document in an image file format. Any native files produced will be renamed with a production number. TIFF image “placeholders” with production numbers corresponding to each Excel or PowerPoint file will be utilized in the productions with appropriate native links provided in producing party’s load file.

5. The mere production of ESI in litigation as part of a mass production shall not itself constitute a waiver for any purpose.

The parties agree that discovery requests and responses will be served electronically, forwarding a copy to each of the following e-mail addresses:

For Plaintiffs:	For Defendant:
Omid E. Khalifeh omid@omnilg.com	Roman Nikhman esq@nikhman.com
Louise Jillian Paris jillian@omnilg.com	
Krista Albregts kalbregts@albregtslaw.com	

In addition, the parties also agree that physical products, or any other discovery production that cannot be served electronically, will be served by Federal Express or other registered mail.

The parties reserve the right to pursue discovery on other issues as permitted under the Federal Rules of Civil Procedure and this Court's Local Rules.

#### **E. Claims of Privilege or Protection.**

None at this time.

#### **Changes to Limitations on Discovery**

The Parties do not anticipate any changes to the discovery limitations set forth in the Federal Rules of Civil Procedure or the Court's Local Rules at this time, with each party reserving all rights to make an application to the Court in the event that discovery becomes unduly burdensome or disproportional to the case.



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